

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re Kostyantyn Bugarenko

Debtor(s)

Case No. 19-11270
Chapter 13

**THIRD MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, STATEMENT OF
FINANCIAL AFFAIRS, MEANS TEST AND CHAPTER 13 PLAN**

Debtor, Kostyantyn Bugarenko, filed this Third Motion for Extension of Time for the filing of Schedules, Statement of Financial Affairs, Means Test and Chapter 13 Plan and in support thereof states as follows:

1. On March 1, 2019, Debtor filed for Bankruptcy Protection, Chapter 13. He was being sued by Creditor Riley Sales, Inc and in order to prevent a Default Judgment for being entered against debtor he filed for Bankruptcy Protection.
2. Debtor has submitted his documents via his wife to counsel, Tova Weiss, and the Petition has been prepared for his review and signatures.
3. The Petition was mailed to Debtor on April 4, 2019, debtor is currently incarcerated by Immigration and Customs Enforcement ("ICE") , he is a legal resident, but has an issue years ago with a DUI and due to his immigration status (legal but not a citizen) was arrested and incarcerated by ICE. the Petition was delivered on April 5, 2019 by the United States Post Office, however due to the delivery delays within the prison system to inmates, debtor has not yet received the Petition as it was not delivered to him internally by the prison system. (See attached Exhibit "A")
4. Debtor respectfully requests that this Honorable Court grant this Third Motion for Extension of Time to File Schedules, Statement of Financial Affairs, Means Test and Chapter 13 Plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court grant this Third Motion for Extension of Time in accordance with the attached Proposed Order.

Respectfully submitted,

/s/Tova Weiss
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4/16/2019

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Kostyantyn Bugarenko**

Debtor(s)

Case No. **19-11270**
Chapter **13**

MOTION TO APPOINT NEXT FRIEND

1. Debtor filed for Bankruptcy Protection on March 1, 2019. The Debtor filed said Bankruptcy Petition due to numerous creditors and lawsuit(s).
2. Debtor is currently incarcerated by Immigration and Customs Enforcement ("ICE") in York County Prison.
3. Counsel for debtor has been communicating with Debtor via mail, and through debtor's spouse, who has been most helpful during the pendency of this instant case.
4. The Bankruptcy Petition was mailed by counsel to Debtor for review and signatures, afterwhich said Petition was filed with the Court.
5. Debtor's counsel has been attempting with great difficulty and no success to schedule the Creditors' meeting at York County Prison. Debtor's counsel has sent letters to the prison, spoken with both debtor's immigration counsel, prison caseworker, the prison Administration office and Trustee Waterman's office (via email and phone calls).
6. Counsel for debtor was lead to believe that on January 8, 2020 (the date the Trustee's office scheduled the Creditors' Meeting for (about) the third time) that she had permission to conduct the Creditors' Meeting at the prison telephonically.
7. On the morning of January 8, 2020 counsel for debtor called the prison Administration office to double check that she can see her client and conduct the telephonic hearing and was told, for the first time, that no telephones were permitted in the prison, unless ICE grants special clearance for the use of the phone.
8. Court Administration called the Officer in charge of the visiting unit, whereby counsel was denied special clearance for said telephonic hearing.
9. Debtor has four (4) children who live at home, three minors and one son who is twenty (20) years old and a dependent parent. Debtor's Bankruptcy case is most important to him in an attempt to get his debts under control and support his dependents.
10. Debtor's spouse, Tatyana Bugarenko, requests to be debtor's "Next Friend" and act on behalf of debtor regarding this said Bankruptcy case.

11. Debtor's best interests will be served by the appointment of Mrs. Tatyana Bugarenko as his "Next Friend" because she is familiar with all of Debtor's finances, financial accounts, income and business.

WHEREFORE, the Debtor respectfully requests that Tatyana Bugarenko be appointed debtor's Next Friend for this Bankruptcy case.

Date: 1/21/2020

Respectfully submitted,
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